

**REMARKS**

Claims 1-5, 7-14, and 16-18 are currently pending, wherein claims 6 and 15 have been canceled and claims 1-5, 7-14, and 16-18 have been amended. Applicants respectfully request favorable reconsideration in view of the remarks presented herein below.

In paragraph 4 of the Office Action (“Action”), the Examiner objects to the abstract because of various informalities. Applicants hereby amend the abstract as suggested by the Examiner, thereby addressing the Examiner’s concerns.

In paragraph 5 of the Action, the Examiner objects to claims 2, 4-8, 10, 11, and 13-17 because of various informalities. Applicants hereby amend claims 2, 4-8, 10, 11, and 13-17 as suggested by the Examiner, thereby addressing the Examiner’s concerns.

In paragraph 7 of the Action, the Examiner rejects claims 1, 4, 10, and 13 under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent No. 6,469,453 to Tajika et al. (“Tajika”). Applicants respectfully traverse this rejection.

In order to support a rejection under 35 U.S.C. §102(e), the cited reference must teach each and every claimed element. In the present case, claims 1, 4, 10, and 13 are not anticipated by Tajika because Tajika fails to disclose each and every claimed element as discussed below.

Independent claim 1 defines a lamp driving apparatus for a liquid crystal display. The apparatus includes, *inter alia*, a plurality of lamps and an inverter block having a plurality of transformers that convert a voltage from a voltage source into a drive current and supply the current to the plurality of lamps wherein a primary winding and a secondary winding of the transformers that supply current to the odd-numbered lamps are wound in the same direction and a primary winding and a secondary winding of the transformers that supply current to the even-numbered lamps are wound in the opposite direction from each other such that the odd-numbered lamps have a different phase from the even-numbered lamps.

Independent claim 1 is patentably distinguishable over Tajika because Tajika fails to disclose a lamp driving apparatus that includes a plurality of transformers wherein the primary and secondary windings are wound in the same direction and a plurality of transformers wherein the primary and second windings are wound in the opposite direction from each other as claimed.

Independent claim 10, like claim 1, defines a lamp driving apparatus that includes, *inter alia*, a plurality of transformers wherein the primary and secondary windings are wound in the same direction and a plurality of transformers wherein the primary and second windings are wound in the opposite direction from each other. Accordingly, independent claim 10 is patentable distinguishable over Tajika for at least those reasons presented above with respect to claim 1.

Claims 4 and 13 depend from independent claims 1 and 10 respectively. Therefore, claims 4 and 13 are patentably distinguishable over Tajika for at least those reasons presented above with respect to claims 1 and 10. Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 1, 4, 10, and 13 under 35 U.S.C. §102(e).

In paragraph 9 of the Action, the Examiner rejects claims 1-7 and 10-16 under 35 U.S.C. §103(a) as allegedly being unpatentable over Applicants' Admitted Prior Art ("related art") in view of Tajika. Applicants respectfully traverse this rejection.

In order to support a rejection under 35 U.S.C. §103, the Examiner must establish a *prima facie* case of obviousness. To establish a *prima facie* case of obviousness, three criteria must be met. First, there must be some motivation to combine the cited references. Second, there must be a reasonable expectation of success. Finally, the combination must teach each and every claimed element. In the present case, claims 1-7 and 10-16 are not rendered unpatentable

over the combination of the related art and Tajika because the Examiner fails to establish a *prima facie* case of obviousness as discussed below.

As shown in FIGs. 1-4 of the instant application, the related art fails to disclose or suggest that the adjacent lamps have a different phase. Furthermore, the primary and secondary windings of the related art transformers are wound in the same direction. In contrast to the claimed invention wherein a plurality of the transformers have primary and secondary windings which are wound in opposite directions from each other. It is the opposite winding direction that produces the different phase of the present invention and thereby prevents leakage current as discussed in the specification. Although Tajika discloses providing pulses with different phases to the lamps, nowhere in the Tajika is there any disclosure or suggestion of the transformers including windings in the opposite direction as claimed.

Since the related art and Tajika both fails to disclose or suggest a lamp driving apparatus that includes a plurality of transformers wherein the primary and seconding windings are wound in the opposite direction, the combination of these two references cannot possibly disclose or suggest said feature. Therefore, even if one skilled in the art were motivated to combine the related art and Tajika the combination would still fail to render claim 1 unpatentable because the combination fails to disclose each and every claimed element.

Independent claim 10, like claim 1, defines a lamp driving apparatus that includes, *inter alia*, a plurality of transformers wherein the primary and secondary windings are wound in the same direction and a plurality of transformers wherein the primary and second windings are wound in the opposite direction from each other. Accordingly, independent claim 10 is patentably distinguishable over the combination of the related art and Tajika for at least those reasons presented above with respect to claim 1.

Claims 2-5, 7, 11-14, and 16 variously depend from independent claims 1 and 10. Therefore, claims 2-5, 7, 11-14, and 16 are patentably distinguishable over the combination of the related art and Tajika for at least those reasons presented above with respect to claims 1 and 10. Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 1-7 and 10-17 under 35 U.S.C. 103(a).

In paragraph 10 of the Action, the Examiner rejects claims 8, 9, 17, and 18 under 35 U.S.C. §103(a) as allegedly being unpatentable over the related art in view of Tajika, further in view of U.S. Patent No. 5,619,402 to Liu ("Liu"). Applicants respectfully traverse this rejection.

Claims 8, 9, 17, and 18 variously depend from independent claims 1 and 10. Therefore, claims 8, 9, 17, and 18 are patentably distinguish over the combination of the related art and Tajika for at least those reasons presented above. In addition, Liu fails to overcome the deficiencies of the related art and Tajika. More specifically, Liu fails to disclose or suggest a lamp driving apparatus that includes a plurality of transformers wherein the primary and seconding windings are wound in the opposite direction.

Since the related art, Tajika, and Liu each fail to disclose or suggest a lamp driving apparatus that includes a plurality of transformers wherein the primary and seconding windings are wound in the opposite direction, the combination of these three references cannot possibly disclose or suggest said feature. Therefore, even if one skilled in the art were motivated to combine the related art, Tajika, and Liu, the combination would still fail to render claims 8, 9, 17, and 18 unpatentable because the combination fails to disclose each and every claimed element. Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 8, 9, 17 and 18 under 35 U.S.C. §103(a).


The application is in condition for allowance. Notice of same is earnestly solicited. Should the Examiner find the application other than in condition for allowance, the Examiner is

requested to call the undersigned attorney at (202) 496-7500 to discuss the steps necessary for placing the application in condition for allowance. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. A duplicate copy of this sheet is enclosed.

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